



Speech-Language &
Audiology Canada
Communicating care

Written Submission for the 2025 Pre-Budget Submission Consultation in Advance of the Upcoming Federal Budget

By: Speech-Language & Audiology Canada

Summary of Recommendations

Recommendation 1: Prioritize recruitment and retention of speech-language pathologists and audiologists in Canada's health workforce strategy.

Recommendation 2: Strengthen federal government regulation and oversight of over-the-counter (OTC) hearing aids to protect the hearing health of Canadians.

Recommendation 3: Eliminate barriers to accessing speech-language pathology and audiology services for Indigenous Communities.

Recommendation 4: Integrate speech-language pathology and audiology services, and resource sharing into Early Childhood Education (ECE) Programs.

Recommendation 5: Implement a National Early Hearing Detection and Intervention (EHDI) program across Canada.

Summary

Speech-language pathologists (S-LPs) and audiologists are regulated health professionals who are uniquely trained to provide evidence-based support for communication health across the lifespan. While their scopes of practice vary across the country, their work supports the early identification, assessment, and treatment of communication, swallowing, and balance disorders, helping Canadians of all ages live healthier, more connected lives.

S-LPs and audiologists provide life-changing and essential services. These professions help children learn, speak, and engage in school, enable adults to remain in the workforce and maintain relationships, and allow seniors to stay in their homes longer, swallow safely, and communicate effectively with caregivers.

Ensuring that S-LPs and audiologists have the necessary resources and support is crucial for maintaining high-quality care and improving patient outcomes. As integral members of Canada's health system, S-LPs and audiologists must be intentionally included in all health care planning and improvement initiatives.

The following sections outline key priorities for advancing speech-language pathology and audiology services across Canada.

Recommendations

Recommendation 1: Prioritize recruitment and retention of speech-language pathologists and audiologists in Canada's health workforce strategy.

S-LPs, audiologists, and communication health assistants provide essential care to Canadians across the country every day. Like many other professionals, they are increasingly burdened by system-wide challenges that impact capacity and service delivery. Key challenges include large workloads, lack of access to necessary resources, and burnout. SAC urges the ***inclusion of speech-language pathologists, audiologists and Communication Health Assistants (CHAs) in health human resources (HHR) strategies***, emphasizing labour mobility to address shortages, particularly in remote and underserved areas.

To address growing patient demand and reduce strain on the healthcare system, we recommend the federal government:

- Expand the Canada Student Loan Forgiveness Program to include S-LPs and audiologists. This will support the federal government's stated commitment to support the future generation with affordable education and training. With this action Canadians will be well equipped to join the workforce while addressing the critical and persistent shortage of essential healthcare professionals. Increased accessibility to this educational pathway will lead to a greater number of skilled S-LPs and audiologists entering rural and remote labour markets and participating in local economies.
- Provide support and funding to federal and provincial/territorial programs and initiatives that assist S-LPs and audiologists practicing in underserved areas.
- Provide support and resources to provinces and territories to expand speech-language pathology and audiology post-graduate programs, especially in less populated areas to support the care currently being provided by primary care physicians.
- Include S-LPs and audiologists in the health workforce planning initiatives currently underway in the following government departments:
 - Health Canada;
 - Immigration, Refugees and Citizenship Canada;
 - Health Workforce Canada;
 - Canadian Institute for Health Information;
 - Statistics Canada; and

- Other government-funded projects.

Recommendation 2: Strengthen federal government oversight of over-the-counter (OTC) hearing aids to protect Canadians.

In 2022, 5.6% of Canadians aged 15 years and over (or over 1.6 million people) had a hearing disability. Over half a million Canadians, or 51% of those with a hearing disability, utilize an assistive aid, device, or technology. Of this group, 65% require hearing aids. With increased consumer access to hearing technologies, ensuring the well-being, safety, and satisfaction of users is a top priority for audiologists.

The Canadian federal government has a role in the approval of hearing aids, as Health Canada is directly responsible for testing and approving all “medical” devices that can be sold in Canada. Approval by Health Canada does not determine whether a medical device will be sold, as the sale of medical devices is controlled at the provincial and territorial level. As more OTC hearing devices seek Health Canada approval, it is crucial to reinforce the obligation to protect the public. The federal government must strengthen regulations on OTC hearing aids to prevent misuse, misdiagnosis, and worsening hearing conditions among Canadians.

SAC urges Health Canada to immediately:

- Mandate stricter performance and safety standards for OTC hearing aids, ensuring they meet clinical efficacy requirements.
- Enforce clear, evidence-based labelling regulations to prevent consumer confusion and potential harm.
- Launch a national consumer education campaign to help Canadians make informed decisions about OTC hearing aids and recognize when professional assessment is needed.

Recommendation 3: Eliminate barriers to accessing speech-language pathology and audiology services for Indigenous Communities.

Speech-language pathologists and audiologists are crucial in improving access to care. They offer specialized language support, ensuring therapy is culturally sensitive and respects linguistic and dialectal differences. Ensuring access to speech-language pathology and audiology services for Indigenous communities can help reduce barriers to language revitalization efforts, ensuring that Indigenous languages and communication traditions are preserved and supported. Addressing these needs can enhance educational outcomes and overall well-being for Indigenous individuals in rural and remote areas.

While Canada recognizes virtual care enhances accessibility in rural, remote, and Indigenous communities, addressing the digital divide is critical for equitable access. As of 2021, 90.9% of households had access to minimum connection speeds across Canada, but only 42.9% of households on First Nations reserves had access at those speeds. As Canada invests in new health and childcare infrastructure, SAC is calling on policymakers to **design with connection and safety in mind**. This means consulting communication health professionals to ensure environments support those who cannot hear, speak, or swallow effectively.

The federal government must act now to:

- Streamline the Non-Insured Health Benefits (NIHB) program and Jordan's Principle reimbursement processes to reduce administrative delays for service providers and increase accessibility to these services.
- Increase federal investment in Indigenous-led speech and hearing health initiatives to improve access to culturally appropriate service delivery.
- Expand telehealth and mobile clinic programs to reach remote Indigenous communities where specialist services are limited or non-existent.

Recommendation 4: Integrate speech-language pathology and audiology services and resource sharing into Early Childhood Education (ECE) Programs.

S-LPs and audiologists play a critical role in supporting literacy development within Canadian education systems. S-LP literacy support must be implemented in a collaborative and interdisciplinary context alongside educators and other professional support. Research has clearly shown the benefits of intervening earlier to prevent long-term impacts on an individual's overall mental health and wellbeing, and ability to participate in the labour force. International literacy assessments indicate that over 40% of Canada's workforce lacks the necessary literacy skills for efficient learning and high productivity in most jobs. Improving workforce literacy by an average of 1% is projected to increase GDP by 3%, or \$54 billion annually, and boost productivity by 5%.

Without timely and effective early interventions, children with poor reading skills are likely to remain that way throughout their academic lives. SL-Ps and audiologists can help students catch up before they fall behind and reduce the number of students requiring interventions later. By helping children in their early years, SL-Ps and audiologists can address the risks associated with lower literacy rates and support the healthy development of future generations.

Between 8% and 12% of Canadian preschoolers experience some form of language impairment, and approximately two students in every K-12 classroom (one in 14 children) will be diagnosed

with developmental language disorder (DLD). This disorder involves difficulties in comprehending and expressing oneself in their native language and does not naturally resolve. Early intervention is crucial for fostering progress and avoiding long-term challenges so that struggles faced in early school years do not impact later employment and economic disadvantages.

SAC calls on the government to:

- Mandate training on speech, language, and hearing development in all federally funded ECE programs, to help educators recognize early signs of communication disorders.
- Provide sustained federal funding to expand ECE training programs that integrate speech-language pathology and audiology expertise.
- Work with provinces and territories to establish national best practices for incorporating S-LPs and audiologists into licensed daycare settings.

Recommendation 5: Implement a National Early Hearing Detection and Intervention (EHDI) program across Canada.

To strengthen early hearing detection and intervention, the federal government should:

- Fund universal newborn hearing screening across all provinces and territories to ensure every baby is tested at birth.
- Support comprehensive early intervention services to support timely care for children diagnosed with hearing loss.
- Expand national research and monitoring efforts to track and improve EHDI outcomes across Canada.
- Work with provinces and territories and including the Canadian Infant Hearing Taskforce, to establish national EHDI program guidelines.

About SAC

Speech-Language & Audiology Canada (SAC) is the only national organization representing speech-language pathologists, audiologists, and communication health assistants across the country. SAC is dedicated to supporting the professionals who help Canadians, **from infants to seniors**, connect, communicate, and live with dignity. SAC works to address gaps in access to communication health services, advocating for a future where every person, regardless of age or ability, can full participate in their communities.

SAC views **connection and maximal participation in one's community as essential to health and well-being**. We believe that every Canadian deserves the opportunity to express themselves, understand others, engage with their community, and nourish themselves safely as this directly

impacts mental, emotional, and physical health. From early intervention and communication support in children to assisting adults with balance or swallowing issues, SAC works to enhance Canadians' quality of life at every stage.

SAC firmly believes speech-language pathologists, audiologists, and communication health assistants deserve a seat at the table given their expertise and range of abilities to support Canadians in connecting with the world around them. Whether it's the building of hospitals, designing senior care, or developing childcare policies, their contributions are essential to truly providing safe, accessible, and effective care across the lifespan. **Our professionals bring the expertise that ensures all Canadians can connect with the world around them, accessibly, safely, and effectively.**

References

1. Speech-Language & Audiology Canada. (n.d). List of Speech-Language Pathology and Audiology Programs in Canada. <https://www.sac-oac.ca/joining-the-profession/academic-programs/>.
2. Canadian Infant Hearing Task Force. (2024). 2024 Report Card: Early Hearing Detection & Intervention.
3. Statistics Canada. (2025). Hearing Disabilities, 2022. <https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2025012-eng.htm>.
4. Office of the Auditor General of Canada. 2023. Connectivity in Rural and Remote Areas. https://www.oag-bvg.gc.ca/internet/English/parl_oag_202303_02_e_44205.html.
5. Newborn Screening Ontario. (n.d.). Blood Spot Screening for Hearing Loss Risk Factors. https://www.newbornscreening.on.ca/sites/default/files/blood_spot_screening_for_hearing_loss_risk_factors_letterheadphase1b.pdf.
6. Rehabilitation and recovery of people with Aphasia after Stroke (RELEASE) Collaborators. (2022). Dosage, Intensity, and Frequency of Language Therapy for Aphasia: A Systematic Review-Based, Individual Participant Data Network Meta-Analysis. *Stroke*, 53(3), 956–967. <https://doi.org/10.1161/STROKEAHA.121.035216>.
7. Hearing Directory. (2025). Hearing aid prices in Canada. <https://www.hearingdirectory.ca/help/hearing-aids/prices>.
8. University of Alberta. (2020). Early intervention leads to better outcomes for kids with speech-language delays, U of A researchers say. <https://www.ualberta.ca/en/rehabilitation/news-and-events/news/2020/october/early-intervention-leads-to-better-outcomes-for-kids-with-speech-language-delays,-u-of-a-researchers-say.html>.

9. BC Chamber of Commerce. 2022-2023 BCCC Policy and Positions Manual.
<https://bcchamber.org/sites/default/files/content-files/Policies%20and%20Positions%20Manuals/2022-2023%20BCCC%20Policy%20and%20Positions%20Manual%20FINAL.pdf>.
10. Ontario Human Rights Commission. Right to Read Inquiry Report.
https://www3.ohrc.on.ca/en/right-read-inquiry-report/10-reading-interventions#_ftn1004.